

CORRES. CONTROL
OUTGOING LTR NO.

DOE ORDER #

98 RF00381



DIST.	LTR	ENC
BACON, R.F.		
BENSUSSEN, S.J.		
BORMOLINI, A.M.		
BRILSFORD, M.D.		
BRYNER, C.J.		
BURDGE, L.		
CARD, R.G.		
COSGROVE, M.M.		
COULTER, W.L.		
CRAWFORD, A.C.		
FERRERA, D.W.		
FERRERA, K.P.		
HARDING, W.A.		
HERRING, C.L.		
HILL, J.A.		
MARTINEZ, L.A.		
PARKER, A.		
TILLER, R.E.		
VOORHEIS, G.M.		

February 10, 1998

98-RF-00381

William Fitch
Decommissioning Program Coordinator
DOE, RFFO

INDIVIDUAL HAZARDOUS SUBSTANCE SITE (IHSS) 121 & 143 SAMPLING AND ANALYSIS
PLAN (SAP) - BUILDING 123 - TGH-005-98

PURPOSE

Notification of Minor Modification of Proposed Action Memorandum (PAM) for the
Decommissioning of Building 123.

DISCUSSION

In accordance with the Rocky Flats Cleanup Agreement (RFCA), Part 10 Changes to Work,
Paragraph 126, DOE is making a written notice to Colorado Department of Public Health and
Environment (CDPHE) of its intent to make minor modification to work being done pursuant to
the Building 123 PAM. These modifications are made to:

1. Clarify our proposed work process; and
2. Correct errors and omissions.

The changes as identified in this letter are minor in nature and do not represent a major
modification to the Building 123 PAM. The proposed minor modifications are listed below.
Each minor modification is followed by a justification:

CLASSIFICATION:		
UCNI		
UNCLASSIFIED	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
CONFIDENTIAL		
SECRET		

1. Section 3.1.2.2, Soil Characterization, Page 17, Revision 5
Soil characterization will include sampling and analysis of soil beneath and surrounding Building
123. Following removal of the building superstructure, samples will be collected through the
slab to determine need for soil remediation. A SAP will be written to guide characterization
activities in these areas. The SAP will be finalized prior to the award of the decommissioning
contract. In accordance with paragraph 118 of the Rocky Flats Cleanup Agreement and the
August 25, 1997 State of Colorado approval of the Building 123 PAM, the IHSS 148 SAP
Remediation Plan will be submitted to the CDPHE for review and approval. The SAP will
incorporate a review of existing records to establish the location of potentially contaminated
areas and to define sampling protocol. Sample location, depth and frequency will include
recommendations from the RFETS Statistical Group. Current planning indicates a need for
approximately fifty (50) soil samples from beneath both the slab of Building 123, and from areas
surrounding underground Original Process Waste Lines (OPWL). Sample locations will be
designed will be collected at depths immediately below the pipe to locate any contamination
that may have leaked from the lines OPWLs associated with Building 123. Samples will be

AUTHORIZED CLASSIFIER
SIGNATURE
YADon

Date

N REPLY TO RFP CC
NO:

ACTION ITEM STATUS

- ☐ PARTIAL/OPEN
- ☒ CLOSED *Let*

TR APPROVALS:

ORIG & TYPIST INITIALS

Kaiser-Hill Company, L.L.C.
Courier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000
Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464

ADMIN RECORD
B123-A-00045

analyzed for volatile organic compounds (VOCs), Target Analyte List (TAL) metals, radionuclides, and nitrates. Data quality requirements supporting the analysis effort will conform to criteria established in *Guidance for the Data Quality Process*, Environmental Protection Agency (EPA) QA/G-4 (EPA 1994).

The reason for these modifications are:

- To remove any linkage between the development and approval of the SAP and the awarding of the decommissioning contract. The SAP has to be approved by CDPHE as required by RFCA and the approval of the Building 123 PAM. There is no need for any further linkage; and
- Specific details of the SAP should not be incorporated into the PAM but left to the review and approval of CDPHE for that specific document. Therefore, specific details of the SAP have been removed.

2. Section 3.1.2.3, OPWL Characterization, Page 17, Revision 5

A plan for partial closure of RCRA Unit 40 will be written to characterize and manage all active OPWLs associated with Building 123, as all abandoned lines were properly decommissioned prior to implementation of Resource Conservation and Recovery Act (RCRA) regulations. Characterization will include flushing the active lines with rinse water with decontamination solutions as identified in the approved closure plan to remove residues, then sampling the final rinsate for constituents. Abandoned OPWLs will be managed according to analyses results from soil samples collected adjacent to and beneath the lines. In accordance with the approved RCRA Closure Plan for this unit.

These modification were made to ensure consistency with the RCRA Closure Plan for the partial closure of the RCRA Unit 40.

3. Section 2.0, Project Description, Page 1, Revision 5

The project will facilitate the following RFCA activities: Phase I, Building 123 Strip-Out; Phase II, Asbestos Abatement; Phase III, Demolition of Building 113, 114, 123, and 123S; and Phase IV, Characterization of IHSS 121 and 148. See Section 3.0, Project Approach and Objectives, for a detailed listing of the elements of each phase. the decommissioning efforts at Buildings 123, 113, 114, and 123S remediation of Individual Hazardous Substance Sites (IHSS) 121 and 148; partial closure of Resource Conservation and Recovery Act (RCRA) Unit 40; and decontamination of radiologically-contaminated facility systems. The Building 123 slab and foundation will be removed as required to remediate any subsurface contamination as dictated by soil sampling results. The PAM will thoroughly examine building removal activities, ...; and removal of all asbestos-containing material (ACM).

These modifications were made to ensure consistency with Section 3.0, Project Approach and Objectives, which lists in detail each element of the Building 123 decommissioning.

4. Section 3.0, Project Approach and Objectives, Page 14, Revision 5
Phase IV, Characterization and Remediation of IHSS 121 and 148. This phase includes the following tasks:

- Sampling the building slab and surrounding soils according to the SAP.
- Sample analysis.
- ~~Developing a remediation plan based on the results of the sampling.~~
- ~~Remediation activities.~~

NOTE: Remediation of any RCRA hazardous waste contaminated soils from that portion of RCRA Unit 40 associated with Building 123 will be conducted in accordance with the approved RCRA Closure Plan for this unit.

All building utilities and associated facility safety systems will be disconnected prior to.... Characterization data from IHSS 121 and 148 will be provided to Environmental Restorations (ER) Projects for evaluation and consideration for remediation. The outcome of this evaluation will be to adjust the ranking of these IHSSs, if necessary, in the ER Ranking List. Soil remediation, if necessary will be conducted with respect to RFCA Action Levels in a manner that is protective of human health and the environment.

These modifications were made to distinguish between the site's approach to management of D&D operations and ER operations.

5. Section 3.1.3.2 Soil Remediation, Page 18, Revision 5
Delete all of this section and replace with the following:

Remedial actions will be contingent upon the results of soil sample analysis. Soil contaminated areas that exhibit chemical contamination at levels in excess of RCRA hazardous waste levels will be excavated using conventional techniques and managed off-site as RCRA hazardous waste. These soils will be moved to a temporary staging area immediately adjacent to the site and placed in containers until proper disposition is determined. At the completion of excavation activities, verification samples will be collected along the bases and sides of the excavation(s) to determine the post action condition of the subsurface soils. Contaminants of concern for hazardous wastes associated with this unit are identified in the closure plan.

Analytical results that indicate soil contamination below RCRA hazardous waste levels will be evaluated by ER Programs. Removal actions involving soil remediation will then be prioritized under RFETS ranking system. This ranking system will ensure site-wide risk reduction consistent with the RFETS final Record of Decision.

Section 3.1.3.2 was rewritten for clarification.

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6. Section 4.1.1 Proposed Action, Page 22, Revision 5

The proposed action is the...DOE and CDPHE. Activities would generally consist of site and facility characterization, decontamination, dismantlement, waste disposition, and remediation of any hazardous waste soil associated with the partial closure of RCRA Unit 40 contaminated soils and pipelines.

This modification was made to clarify that soils contaminated with RCRA regulated levels of hazardous waste would be the object of remediation activities.

7. Section 4.1.1 Proposed Action, Page 22, fourth paragraph, Revision 5

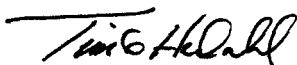
Final D&D activities would include remediation of hazardous waste soil associated with the partial closure of RCRA Unit 40 and underground piping beneath and surrounding the building slab.

This modification was made to clarify that soils contaminated with RCRA regulated levels of hazardous waste would be the object of remediation activities.

It is important to note that these minor modifications do not in any way impact the decommissioning of Building 123. These minor modifications are provided to clarify work processes and to correct errors and omissions.

RESPONSE REQUIREMENTS

No response is required. Contact Kent Dorr at extension 6034, or contact my office at extension 4111 or 3432, if there are any additional comments or concerns.



Tim G. Hedahl
Acting Division Manager of D&D Projects
Kaiser-Hill Company, L.L.C.

KLK:alw

Orig. and 1 cc - William Fitch